

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

	)	
In re:	)	Chapter 11
	)	
THE OHIO VALLEY COAL COMPANY,	)	Case No. 19-56884 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1041310	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY ENERGY HOLDINGS CO.,	)	Case No. 19-56885 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 20-0100463	)	
	)	
In re:	)	Chapter 11
	)	
AMCA COAL LEASING, INC.,	)	Case No. 19-56886 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 61-0914254	)	
	)	
In re:	)	Chapter 11
	)	
AMCOAL HOLDINGS, INC.,	)	Case No. 19-56889 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1867389	)	
	)	
In re:	)	Chapter 11
	)	
AMERICAN COMPLIANCE COAL, INC.,	)	Case No. 19-56893 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1797161	)	

	)	
In re:	)	Chapter 11
	)	
AMERICAN ENERGY CORPORATION,	)	Case No. 19-56897 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 31-1550443	)	
	)	
In re:	)	Chapter 11
	)	
AMERICAN EQUIPMENT & MACHINE, INC.,	)	Case No. 19-56901 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1632808	)	
	)	
In re:	)	Chapter 11
	)	
AMERICAN MINE SERVICES, INC.,	)	Case No. 19-56903 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-3389502	)	
	)	
In re:	)	Chapter 11
	)	
AMERICAN NATURAL GAS, INC.,	)	Case No. 19-56907 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 27-0654094	)	
	)	
In re:	)	Chapter 11
	)	
AMERICANHOCKING ENERGY, INC.,	)	Case No. 19-56912 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1635301	)	

	)	
In re:	)	Chapter 11
	)	
AMERICANMOUNTAINEER ENERGY, INC.,	)	Case No. 19-56916 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 26-3553404	)	
	)	
In re:	)	Chapter 11
	)	
AMERICANMOUNTAINEER PROPERTIES,	)	Case No. 19-56920 (JEH)
INC.,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4073508	)	
	)	
In re:	)	Chapter 11
	)	
ANCHOR LONGWALL AND REBUILD, INC.,	)	Case No. 19-56925 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 55-0749933	)	
	)	
In re:	)	Chapter 11
	)	
ANDALEX RESOURCES, INC.,	)	Case No. 19-56932 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 61-0931325	)	
	)	
In re:	)	Chapter 11
	)	
ANDALEX RESOURCES MANAGEMENT, INC.,	)	Case No. 19-56929 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 61-1170277	)	

	)	
In re:	)	Chapter 11
	)	
AVONMORE RAIL LOADING, INC.,	)	Case No. 19-56936 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1253970	)	
	)	
In re:	)	Chapter 11
	)	
BELMONT COAL, INC.,	)	Case No. 19-56940 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 31-1536602	)	
	)	
In re:	)	Chapter 11
	)	
BELMONT COUNTY BROADCAST STUDIO, INC.,	)	Case No. 19-56945 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-1809364	)	
	)	
In re:	)	Chapter 11
	)	
CANTERBURY COAL COMPANY,	)	Case No. 19-56949 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1127473	)	
	)	
In re:	)	Chapter 11
	)	
CCC LAND RESOURCES LLC,	)	Case No. 19-56953 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4075129	)	

	)	
In re:	)	Chapter 11
	)	
CCC RCPC LLC,	)	Case No. 19-56956 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4070016	)	
	)	
In re:	)	Chapter 11
	)	
CENTRAL OHIO COAL COMPANY,	)	Case No. 19-56887 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 31-4356096	)	
	)	
In re:	)	Chapter 11
	)	
COAL RESOURCES HOLDINGS CO.,	)	Case No. 19-56890 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 20-0100479	)	
	)	
In re:	)	Chapter 11
	)	
COAL RESOURCES, INC.,	)	Case No. 19-56892 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1586390	)	
	)	
In re:	)	Chapter 11
	)	
CONSOLIDATED LAND COMPANY,	)	Case No. 19-56894 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1769562	)	

	)	
In re:	)	Chapter 11
	)	
CONSOLIDATION COAL COMPANY,	)	Case No. 19-56898 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 13-2566594	)	
	)	
In re:	)	Chapter 11
	)	
CORPORATE AVIATION SERVICES, INC.,	)	Case No. 19-56902 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1603750	)	
	)	
In re:	)	Chapter 11
	)	
EIGHTY-FOUR MINING COMPANY,	)	Case No. 19-56904 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1695903	)	
	)	
In re:	)	Chapter 11
	)	
EMPIRE DOCK, INC.,	)	Case No. 19-56908 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 27-0332407	)	
	)	
In re:	)	Chapter 11
	)	
ENERGY RESOURCES, INC.,	)	Case No. 19-56911 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 31-1044044	)	

	)	
In re:	)	Chapter 11
	)	
ENERGY TRANSPORTATION, INC.,	)	Case No. 19-56915 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1426879	)	
	)	
In re:	)	Chapter 11
	)	
GENWAL RESOURCES, INC.,	)	Case No. 19-56919 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 87-0533099	)	
	)	
In re:	)	Chapter 11
	)	
KANAWHA TRANSPORTATION CENTER,	)	Case No. 19-56922 (JEH)
INC.,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1682102	)	
	)	
In re:	)	Chapter 11
	)	
KENAMERICAN RESOURCES, INC.,	)	Case No. 19-56926 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 61-1264385	)	
	)	
In re:	)	Chapter 11
	)	
KEYSTONE COAL MINING CORPORATION,	)	Case No. 19-56930 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1323822	)	

	)	
In re:	)	Chapter 11
	)	
MAPLE CREEK MINING, INC.,	)	Case No. 19-56935 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1755305	)	
	)	
In re:	)	Chapter 11
	)	
MAPLE CREEK PROCESSING, INC.,	)	Case No. 19-56938 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1804630	)	
	)	
In re:	)	Chapter 11
	)	
MCELROY COAL COMPANY,	)	Case No. 19-56942 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1553551	)	
	)	
In re:	)	Chapter 11
	)	
MILL CREEK MINING COMPANY,	)	Case No. 19-56946 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 31-1040986	)	
	)	
In re:	)	Chapter 11
	)	
MON RIVER TOWING, INC.,	)	Case No. 19-56948 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1087222	)	

	)	
In re:	)	Chapter 11
	)	
MONVALLEY TRANSPORTATION CENTER, INC.,	)	Case No. 19-56952 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1490495	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN COAL, INC.,	)	Case No. 19-56888 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 47-3295883	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN ENERGY, INC.,	)	Case No. 19-56891 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4091556	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN KENTUCKY TOWING, INC.,	)	Case No. 19-56896 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 47-1542086	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN MINERALS, INC.,	)	Case No. 19-56900 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 81-4274943	)	

	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN RESOURCES, INC.,	)	Case No. 19-56906 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1875051	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN RIVER TOWING, INC.,	)	Case No. 19-56910 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4293881	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY AMERICAN TRANSPORTATION, INC.,	)	Case No. 19-56914 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4072837	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY COLOMBIAN RESOURCES, LLC,	)	Case No. 19-56918 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. 37-1793892	)	
	)	
In re:	)	Chapter 11
	)	
MURRAY EQUIPMENT & MACHINE, INC.,	)	Case No. 19-56924 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 47-1711788	)	

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In re:	Chapter 11
MURRAY GLOBAL COMMODITIES, INC.,	Case No. 19-56981 (JEH)
Debtor.	

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Tax I.D. No. 47-4230675

In re:	)	Chapter 11
MURRAY KENTUCKY ENERGY SERVICES, INC.,	)	Case No. 19-56928 (JEH)
Debtor.	)	

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Tax I.D. No. 82-4039675

In re:	)	Chapter 11
MURRAY KENTUCKY ENERGY, INC.,	)	Case No. 19-56933 (JEH)
Debtor.	)	

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Tax I.D. No. 82-4020295

In re:	)	Chapter 11
MURRAY KEYSTONE PROCESSING, INC.,	)	Case No. 19-56939 (JEH)
Debtor.	)	

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Tax I.D. No. 46-4068709

In re:	)	Chapter 11
MURRAY SOUTH AMERICA, INC.,	)	Case No. 19-56944 (JEH)
Debtor.	)	

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Tax I.D. No. 46-2065263

	)	
In re:	)	Chapter 11
	)	
MURRAY UTAH ENERGY SERVICES, INC.,	)	Case No. 19-56950 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-3350080	)	
	)	
In re:	)	Chapter 11
	)	
OHIOAMERICAN ENERGY, INCORPORATED,	)	Case No. 19-56961 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 20-3044610	)	
	)	
In re:	)	Chapter 11
	)	
OHIO ENERGY TRANSPORTATION, INC.,	)	Case No. 19-56955 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 45-3126348	)	
	)	
In re:	)	Chapter 11
	)	
OHIO VALLEY RESOURCES, INC.,	)	Case No. 19-56958 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1586391	)	
	)	
In re:	)	Chapter 11
	)	
ONEIDA COAL COMPANY, INC.,	)	Case No. 19-56964 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 62-1011712	)	

	)	
In re:	)	Chapter 11
	)	
PENNAMERICAN COAL L.P.,	)	Case No. 19-56967 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1800809	)	
	)	
In re:	)	Chapter 11
	)	
PENNAMERICAN COAL, INC.,	)	Case No. 19-56970 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1722115	)	
	)	
In re:	)	Chapter 11
	)	
PENNSYLVANIA TRANSLOADING, INC.,	)	Case No. 19-56973 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1603748	)	
	)	
In re:	)	Chapter 11
	)	
PINSKI CORP.,	)	Case No. 19-56975 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1800870	)	
	)	
In re:	)	Chapter 11
	)	
PLEASANT FARMS, INC.,	)	Case No. 19-56978 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1616122	)	

	)	
In re:	)	Chapter 11
	)	
PREMIUM COAL, INC.,	)	Case No. 19-56980 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. N/A	)	
	)	
In re:	)	Chapter 11
	)	
SOUTHERN OHIO COAL COMPANY,	)	Case No. 19-56974 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 55-0403282	)	
	)	
In re:	)	Chapter 11
	)	
SPRING CHURCH COAL COMPANY,	)	Case No. 19-56976 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1372128	)	
	)	
In re:	)	Chapter 11
	)	
SUNBURST RESOURCES, INC.,	)	Case No. 19-56977 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1766427	)	
	)	
In re:	)	Chapter 11
	)	
T D K COAL SALES, INCORPORATED,	)	Case No. 19-56979 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1422374	)	

	)	
In re:	)	Chapter 11
	)	
THE AMERICAN COAL COMPANY,	)	Case No. 19-56895 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 73-1543124	)	
	)	
In re:	)	Chapter 11
	)	
THE AMERICAN COAL SALES COMPANY,	)	Case No. 19-56899 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1603699	)	
	)	
In re:	)	Chapter 11
	)	
THE FRANKLIN COUNTY COAL COMPANY,	)	Case No. 19-56905 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4797001	)	
	)	
In re:	)	Chapter 11
	)	
THE HARRISON COUNTY COAL COMPANY,	)	Case No. 19-56909 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4067631	)	
	)	
In re:	)	Chapter 11
	)	
THE MARION COUNTY COAL COMPANY,	)	Case No. 19-56913 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4067755	)	

	)	
In re:	)	Chapter 11
	)	
THE MARSHALL COUNTY COAL COMPANY,	)	Case No. 19-56917 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4064123	)	
	)	
In re:	)	Chapter 11
	)	
THE MCLEAN COUNTY COAL COMPANY,	)	Case No. 19-56921 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 47-2873930	)	
	)	
In re:	)	Chapter 11
	)	
THE MEIGS COUNTY COAL COMPANY,	)	Case No. 19-56923 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-5088058	)	
	)	
In re:	)	Chapter 11
	)	
THE MONONGALIA COUNTY COAL	)	Case No. 19-56927 (JEH)
COMPANY,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4067864	)	
	)	
In re:	)	Chapter 11
	)	
THE MUHLENBERG COUNTY COAL	)	Case No. 19-56931 (JEH)
COMPANY, LLC,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4321395	)	

	)	
In re:	)	Chapter 11
	)	
THE MUSKINGUM COUNTY COAL	)	Case No. 19-56934 (JEH)
COMPANY,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-5088685	)	
	)	
In re:	)	Chapter 11
	)	
THE OHIO COUNTY COAL COMPANY,	)	Case No. 19-56937 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-4054000	)	
	)	
In re:	)	Chapter 11
	)	
THE OHIO VALLEY TRANSLOADING	)	Case No. 19-56941 (JEH)
COMPANY,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1611209	)	
	)	
In re:	)	Chapter 11
	)	
THE OKLAHOMA COAL COMPANY,	)	Case No. 19-56943 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1673480	)	
	)	
In re:	)	Chapter 11
	)	
THE WASHINGTON COUNTY COAL	)	Case No. 19-56947 (JEH)
COMPANY,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 46-5087540	)	

	)	
In re:	)	Chapter 11
	)	
THE WESTERN KENTUCKY COAL COMPANY,	)	Case No. 19-56951 (JEH)
LLC,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4339481	)	
	)	
In re:	)	Chapter 11
	)	
TWIN RIVERS TOWING COMPANY,	)	Case No. 19-56954 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 25-1181155	)	
	)	
In re:	)	Chapter 11
	)	
UMCO ENERGY, INC.,	)	Case No. 19-56957 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 52-1615668	)	
	)	
In re:	)	Chapter 11
	)	
UTAHAMERICAN ENERGY, INC.,	)	Case No. 19-56959 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 34-1874726	)	
	)	
In re:	)	Chapter 11
	)	
WEST RIDGE RESOURCES, INC.,	)	Case No. 19-56960 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 87-0585129	)	

	)	
In re:	)	Chapter 11
	)	
WEST VIRGINIA RESOURCES, INC.,	)	Case No. 19-56962 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 55-0713676	)	
	)	
In re:	)	Chapter 11
	)	
WESTERN KENTUCKY COAL RESOURCES,	)	Case No. 19-56963 (JEH)
LLC,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4289665	)	
	)	
In re:	)	Chapter 11
	)	
WESTERN KENTUCKY CONSOLIDATED	)	Case No. 19-56965 (JEH)
RESOURCES, LLC,	)	
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4311036	)	
	)	
In re:	)	Chapter 11
	)	
WESTERN KENTUCKY LAND HOLDING, LLC,	)	Case No. 19-56966 (JEH)
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4393386	)	
	)	
In re:	)	Chapter 11
	)	
WESTERN KENTUCKY RAIL LOADOUT, LLC,	)	Case No. 19-56968 (JEH))
	)	
Debtor.	)	
	)	
Tax I.D. No. 82-4383294	)	

In re:	)	Chapter 11
WESTERN KENTUCKY RESOURCES	)	Case No. 19-56969 (JEH)
FINANCING, LLC,	)	
Debtor.	)	
Tax I.D. No. 82-4363248	)	
In re:	)	Chapter 11
WESTERN KENTUCKY RESOURCES, LLC,	)	Case No. 19-56971 (JEH)
Debtor.	)	
Tax I.D. No. 82-4356825	)	
In re:	)	Chapter 11
WESTERN KENTUCKY RIVER LOADOUT,	)	Case No. 19-56972 (JEH)
LLC,	)	
Debtor.	)	Judge John E. Hoffman
Tax I.D. No. 82-4375314	)	

**DEBTORS' MOTION FOR ENTRY OF AN  
ORDER (I) DIRECTING JOINT ADMINISTRATION OF  
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state as follows in support of this motion:<sup>1</sup>

1 The facts and circumstances supporting this motion are set forth in the *Declaration of Robert D. Moore, President, Chief Executive Officer, and Chief Financial Officer of Murray Energy Holdings Co., in Support of Chapter 11 Petitions* (the “Moore Declaration”) and the *Declaration of Robert A. Campagna, Managing Director at Alvarez & Marsal North America, LLC, in Support of First Day Motions* (the “Campagna Declaration”), filed contemporaneously herewith and incorporated by reference herein (collectively, the “First Day Declarations”). Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the First Day Declarations.

**Relief Requested**

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A**, (a) directing procedural consolidation and joint administration of these chapter 11 cases, and (b) granting related relief. The Debtors request that one file and one docket be maintained for all of the jointly administered cases under the case of Murray Energy Holdings Co. (the parent company for each of the Debtors) and that the cases be administered under a consolidated caption, as follows:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

In re:	)	
	)	Chapter 11
MURRAY ENERGY HOLDINGS CO., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 19-56885 (JEH)
	)	
	)	Judge John E. Hoffman
	)	
Debtors.	)	(Jointly Administered)
	)	

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. Such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.primeclerk.com/MurrayEnergy>. The location of Debtor Murray Energy Holdings Co.'s principal place of business and the Debtors' service address in these chapter 11 cases is 46226 National Road, St. Clairsville, Ohio 43950.

2. The Debtors further request that this Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”).

3. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtors other than Murray Energy Holdings Co. to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration for procedural purposes only of the chapter 11 cases of: Murray Energy Holdings Co., Case No. 19-56885 (JEH); AMCA Coal Leasing, Inc., Case No. 19-56886 (JEH); AmCoal Holdings, Inc., Case No. 19-56889 (JEH); American Compliance Coal, Inc., Case No. 19-56893 (JEH); American Energy Corporation, Case No. 19-56897 (JEH); American Equipment & Machine, Inc., Case No. 19-56901 (JEH); American Mine Services, Inc., Case No. 19-56903 (JEH); American Natural Gas, Inc., Case No. 19-56912 (JEH); AmericanHocking Energy, Inc., Case No. 19-56916 (JEH); AmericanMountaineer Energy, Inc., Case No. 19-56916 (JEH); AmericanMountaineer Properties, Inc., Case No. 19-56920 (JEH); Anchor Longwall and Rebuild, Inc., Case No. 19-56925 (JEH); Andalex Resources, Inc., Case No. 19-56932 (JEH); Andalex Resources Management, Inc., Case No. 19-56929 (JEH); Avonmore Rail Loading, Inc., Case No. 19-56936 (JEH); Belmont Coal, Inc., Case No. 19-56940 (JEH); Belmont County Broadcast Studio, Inc., Case No. 19-56945 (JEH); Canterbury Coal Company, Case No. 19-56949 (JEH); CCC Land Resources LLC, Case No. 19-56953 (JEH); CCC RCPC LLC, Case No. 19-56956 (JEH); Central Ohio Coal Company, Case No. 19-56887 (JEH); Coal Resources Holdings Co., Case No. 19-56890 (JEH); Coal Resources, Inc., Case No. 19-56892 (JEH); Consolidated Land Company, Case No. 19-56894 (JEH); Consolidation Coal Company, Case No. 19-56898 (JEH); Corporate Aviation Services, Inc., Case No. 19-56902 (JEH); Eighty-Four Mining Company, Case No. 19-56904 (JEH); Empire Dock, Inc., Case No. 19-56908\_ (JEH); Energy Resources, Inc., Case No. 19-56911 (JEH); Energy Transportation, Inc., Case No. 19-56915 (JEH); Genwal Resources, Inc., Case No. 19-56919 (JEH); Kanawha Transportation Center, Inc., Case No. 19-56922 (JEH); KenAmerican Resources, Inc., Case No. 19-56926 (JEH); Keystone Coal Mining Corporation, Case No. 19-56930 (JEH); Maple Creek Mining, Inc., Case No. 19-56938 (JEH); Maple Creek Processing, Inc., Case No. 19-56938 (JEH); McElroy Coal Company, Case No. 19-56942 (JEH); Mill Creek Mining Company, Case No. 19-56946 (JEH); Mon River Towing, Inc., Case No. 19-56942 (JEH); MonValley Transportation Center, Inc., Case No. 19-56952 (JEH); Murray American Coal, Inc., Case No. 19-56888 (JEH); Murray American Energy, Inc., Case No. 19-56891 (JEH); Murray American Kentucky Towing, Inc., Case No. 19-56896 (JEH); Murray American Minerals, Inc., Case No. 19-56900 (JEH); Murray American Resources, Inc.,

Case No. 19-56906 (JEH); Murray American River Towing, Inc., Case No. 19-56910 (JEH); Murray American Transportation, Inc., Case No. 19-56914 (JEH); Murray Colombian Resources, LLC, Case No. 19-56918 (JEH); Murray Equipment & Machine, Inc., Case No. 19-56924 (JEH); Murray Global Commodities, Inc., Case No. 19-56981 (JEH); Murray Kentucky Energy Services, Inc., Case No. 19-56928 (JEH); Murray Kentucky Energy, Inc., Case No. 19-56933 (JEH); Murray Keystone Processing, Inc., Case No. 19-56939 (JEH); Murray South America, Inc., Case No. 19-56944 (JEH); Murray Utah Energy Services, Inc., Case No. 19-56950 (JEH); OhioAmerican Energy, Incorporated, Case No. 19-56961 (JEH); Ohio Energy Transportation, Inc., Case No. 19-56955 (JEH); Ohio Valley Resources, Inc., Case No. 19-56958 (JEH); Oneida Coal Company, Inc., Case No. 19-56964 (JEH); PennAmerican Coal L.P., Case No. 19-56967 (JEH); PennAmerican Coal, Inc., Case No. 19-56970 (JEH); Pennsylvania Transloading, Inc., Case No. 19-56973 (JEH); Pinski Corp., Case No. 19-56975 (JEH); Pleasant Farms, Inc., Case No. 19-56978 (JEH); Premium Coal, Inc., Case No. 19-56980 (JEH); Southern Ohio Coal Company, Case No. 19-56974 (JEH); Spring Church Coal Company, Case No. 19-56976 (JEH); Sunburst Resources, Inc., Case No. 19-56977 (JEH); T D K Coal Sales, Incorporated, Case No. 19-56979 (JEH); The American Coal Company, Case No. 19-56895 (JEH); The American Coal Sales Company, Case No. 19-56899 (JEH); The Franklin County Coal Company, Case No. 19-56905 (JEH); The Harrison County Coal Company, Case No. 19-56909 (JEH); The Marion County Coal Company, Case No. 19-56913 (JEH); The Marshall County Coal Company, Case No. 19-56917 (JEH); The McLean County Coal Company, Case No. 19-56921 (JEH); The Meigs County Coal Company, Case No. 19-56923 (JEH); The Monongalia County Coal Company, Case No. 19-56927 (JEH); The Muhlenberg County Coal Company, LLC, Case No. 19-56931 (JEH); The Muskingum County Coal Company, Case No. 19-56934 (JEH); The Ohio County Coal Company, Case No. 19-56937 (JEH); The Ohio Valley Transloading Company, Case No. 19-56941 (JEH); The Oklahoma Coal Company, Case No. 19-56943 (JEH); The Washington County Coal Company, Case No. 19-56947 (JEH); The Western Kentucky Coal Company, LLC, Case No. 19-56951 (JEH); Twin Rivers Towing Company, Case No. 19-56954 (JEH); UMC Energy, Inc., Case No. 19-56957 (JEH); UtahAmerican Energy, Inc., Case No. 19-56959 (JEH); West Ridge Resources, Inc., Case No. 19-56960 (JEH); West Virginia Resources, Inc., Case No. 19-56962 (JEH); Western Kentucky Coal Resources,

LLC, Case No. 19-56963 (JEH); Western Kentucky Consolidated Resources, LLC, Case No. 19-56965 (JEH); Western Kentucky Land Holding, LLC, Case No. 19-56966 (JEH); Western Kentucky Rail Loadout, LLC, Case No. 19-56968 (JEH); Western Kentucky Resources Financing, LLC, Case No. 19-5699 (JEH); Western Kentucky Resources, LLC, Case No. 19-56971 (JEH); Western Kentucky River Loadout, LLC, Case No. 19-56972 (JEH). The docket in Case No. 19-56885 should be consulted for all matters affecting this case.

4. The Debtors also seek authority to fulfill their monthly operating report requirements required by the *Chapter 11 Operating Instructions and Reporting Requirements*, issued by the United States Trustee for Region 9 (the “U.S. Trustee”), by consolidating the information required for each Debtor in one report that tracks and breaks out all of the specific information on a debtor-by-debtor basis in each monthly operating report.

#### **Jurisdiction and Venue**

5. The United States Bankruptcy Court for the Southern District of Ohio (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *General Order 30-2* from the United States Bankruptcy Court for the Southern District of Ohio, dated October 10, 2019 (the “General Order”). The Debtors confirm their consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

6. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Bankruptcy Rule 1015(b), the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Ohio (the “Local Rules”), and the General Order.

### **Background**

8. Murray Energy Holdings Co. (together with its Debtor and non-debtor subsidiaries, “Murray”), is the largest privately-owned coal company in the United States, producing about 53 million tons of high quality bituminous coal in 2018, and employing nearly 5,500 people, including approximately 2,400 active union members.<sup>2</sup> Headquartered in St. Clairsville, Ohio, Murray owns and operates 13 active mines across the Northern, Central, and Southern Appalachia Basins (located in Ohio, West Virginia, eastern Kentucky, and Alabama), the Illinois Basin (located in Illinois and western Kentucky), the Uintah Basin (located in Utah), and Colombia, South America. Murray also manages and operates five additional mines in the Illinois Basin through its partnership with non-debtor Foresight Energy LP. Excluding Foresight-related operations, Murray’s operations generated approximately \$2.5 billion in revenue related to coal sales and \$542.3 million of EBITDA in 2018. As of the date hereof (the “Petition Date”), the Debtors have approximately \$2.7 billion in funded debt and over \$8 billion in actual or potential legacy liability obligations under various pension and benefit plans.

9. On the Petition Date, each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are authorized to continue operating their business and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Also on the Petition Date, the Debtors filed their Notice of Election of Complex Chapter 11 Cases.

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<sup>2</sup> These amounts exclude individuals employed through the Debtors’ partnership with non-debtor affiliate Foresight Energy LP, but include employees at the operating companies of non-debtor subsidiary, Murray Metallurgical Coal Holdings, LLC.

### **Basis for Relief**

10. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015. The 97 Debtor entities that commenced chapter 11 cases are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

11. Joint administration is generally non-controversial, and courts in this jurisdiction routinely order joint administration in cases with multiple related debtors. *See, e.g., In re Milacron Inc., a Delaware corporation*, No. 09-11235 (JVA) (Bankr. S.D. Ohio Mar. 12, 2009) (directing joint administration of chapter 11 cases); *In re FirstEnergy Solutions Corp.*, No. 18-50757 (AMK) (Bankr. N.D. Ohio Apr. 3, 2018) (same); *In re SCI Direct, LLC*, No. 17-61735 (AMK) (Bankr. N.D. Ohio Aug. 11, 2017) (same); *In re Curae Health, Inc.*, No. 18-05665 (CMW) (Bankr. M.D. Tenn. Aug. 29, 2018) (same); *In re Auto Masters, LLC*, No. 17-7036 (CMW) (Bankr. M.D. Tenn. Oct. 19, 2017) (same).<sup>2</sup>

12. Given the integrated nature of the Debtors’ operations, and that virtually all of the Debtors are liable for the Debtors’ funded debt, joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each Debtor entity. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration

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<sup>2</sup> Because of the voluminous nature of the orders cited herein, such orders have not been attached to this motion. Copies of these orders are available upon request to the Debtors’ proposed counsel.

also will allow the U.S. Trustee and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

13. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because this motion seeks only administrative, not substantive, consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested; instead, parties in interest will benefit from the cost reductions associated with the joint administration of these chapter 11 cases. Accordingly, the Debtors submit that the joint administration of these chapter 11 cases is in the best interests of their estates, their creditors, and all other parties in interest.

#### **Motion Practice**

14. This motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this motion. Accordingly, the Debtors submit that this motion satisfies Local Rule 9013-1(a).

#### **Notice**

15. The Debtors have provided notice of this motion to the following parties or their respective counsel: (a) the U.S. Trustee for the Southern District of Ohio; (b) the holders of the 50 largest unsecured claims against the Debtors (on a consolidated basis); (c) the indenture trustee under the Debtors' prepetition indentures; (d) the administrative agent under the Debtors' prepetition asset-based and term loan facilities; (e) the administrative agent under the Debtors' proposed debtor-in-possession financing facility; (f) counsel to the Ad Hoc Group of Superpriority Lenders; (g) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors operate; (h) the office of the attorneys general for the states in which the Debtors operate; (i) the United States Attorney's Office for the Southern District of Ohio; (j) the Internal Revenue Service; (k) the Pension Benefit Guaranty Corporation;

(l) the United Mine Workers of America; (m) the Seafarers International Union; and (n) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Request**

16. No prior request for the relief sought in this motion has been made to this or any other court.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: October 29, 2019  
Cincinnati, Ohio

/s/ Kim Martin Lewis

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